

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ESTHER KIOBEL, et al.,

Plaintiffs,

v.

ROYAL DUTCH PETROLEUM COMPANY, et al.,

Defendants.

Civil Action No. 1:02-cv-07618

**PLAINTIFF'S NOTICE OF MOTION AND MOTION TO CLARIFY AND/OR
MODIFY ORDER REGARDING CONFIDENTIALITY OF DISCOVERY MATERIALS**

PLEASE TAKE NOTICE that upon the Declaration of Marco Simons, dated May 15, 2009, and the Memorandum of Law in Support of Plaintiff's Motion to Clarify and/or Modify Stipulation and Order Regarding Confidentiality of Discovery Materials, dated May 15, 2019, and all prior proceedings herein, Plaintiff Esther Kiobel hereby moves this Court, before the Hon. Kimba Wood, at the U.S. District Courthouse, 500 Pearl Street, New York, NY, for an order, pursuant to paragraph 23 of Exhibit A of the Court's Order Regarding Confidentiality of Discovery Materials, filed October 28, 2002, clarifying that that Order allows use of confidential materials in support of Ms. Kiobel's claims being litigated in the Netherlands, or in the alternative modifying the Order to allow such use, and granting such other and further relief as the Court deems just and proper.

Dated: May 15, 2019

Respectfully submitted,

s/ BENJAMIN HOFFMAN, ESQ.

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pending)
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* Ms. Graziano's application for admission has been accepted, and she is scheduled to be sworn in to this Court on June 4, 2019.